

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STATE OF NEW YORK, et al.,)

)

Plaintiffs,)

v.)

CIVIL ACTION NO. 25-11221-WGY

DONALD J. TRUMP, in his official capacity)

as President of the United States, et al.,)

)

Defendants.)

)

DECLARATION OF PATRICK CROWLEY
CO-CHAIR OF CLIMATE JOBS RHODE ISLAND

I, Patrick Crowley, pursuant to 28 U.S.C. § 1746, hereby declare that:

RELEVANT BACKGROUND AND EXPERIENCE

1. I am over the age of 18 and competent to testify to the facts contained in this Declaration.
2. I am Co-Chair of Climate Jobs Rhode Island (“CJRI”), in addition to being the President of the Rhode Island AFL-CIO. I am a union organizer with nearly 30 years of service to the labor movement. In 2021, I helped found Climate Jobs Rhode Island, a broad and growing coalition of labor, environmental, and community partners committed to a just transition to an equitable, pro-worker, pro-climate green economy.

3. Climate Jobs Rhode Island (CJRI) is a coalition of more than thirty (30) labor unions, environmental, and community organizations committed to working together to make Rhode Island a national leader in the development of a resilient 21st century economy through a Just Transition, that centers our frontline communities and frontline workers.

4. Our members include organizations that represent the frontline workers that build, repair, and maintain Rhode Island's critical infrastructure and energy systems, as well as community groups, and environmental organizations.

5. As Co-Chair of CJRI, I work in close partnership with labor union leaders, environmental organizations, and frontline communities to build and advance a strategic vision that reflects both climate science and economic justice. The buildout of an American offshore wind industry is a critical part of the strategic vision that we have spent years developing right here in Rhode Island. And it is this strategic vision that then resulted in the formation of the CJRI coalition, to work to bring that vision to fruition.

6. Our deep interest in offshore wind stems from the hundreds of workers our coalition members represent in Rhode Island currently working on offshore wind, and the many additional hundreds of workers that the offshore wind industry was slated to employ in the near future. Members of our coalition represent workers building out our state's port infrastructure, workers employed in the construction of wind farms, and workers employed servicing turbines in operation and maintenance after they are built.

7. Our coalition members have invested time and money creating and utilizing training programs for the workers they represent that are specific to the offshore wind industry. These include trainings and certifications from the Society of Professional Rope Access Technicians, Helicopter Underwater Egress Training, and Rhode Island's own Global Wind Organization (GWO) accredited Basic Safety Training center, brought to the state through the dedicated efforts of the Rhode Island Building and Construction Trades Council in partnership with Building Futures and the Community College of Rhode Island (CCRI).

8. In addition, the GWO training that members of our coalition, including the International Brotherhood of Electrical Workers Local 99, International Union of Painters and Allied Trades Local 195, Iron Workers Local 37, the Laborers International Union of North America, and the United Brotherhood of Carpenters have worked to develop at CCRI offers specific modules in Working at Heights, Manual Handling, First Aid, Sea Survival, and Fire Awareness – training that is required to work on offshore wind projects. To date, 170 workers that our coalition members represent have spent time and resources to learn these specialized skills to qualify for the future employment on the thousands of jobs that the offshore wind industry has promised to bring to Rhode Island.

9. Because of the President's Executive Order mandating a pause in granting permits related to wind energy projects, our members' workers are being put out of work, and they are losing out on opportunities to recoup on the investments in training and equipment that our members and the workers they represent have made.

10. Prospects of future employment—good jobs, paying living wages, providing health care, and retirement security—for Rhode Island workers are being taken away without any justification or consideration of those workers’ interests, and may not be recoverable. As a result of the pause, the training of additional workers with the necessary skills to do the complex work required in the off shore wind industry is for naught, and Rhode Island workers are questioning whether they should commit their future to this industry – meaning that, even if the industry comes back, American workers will not available to do these jobs – essentially ceding work in this growing global industry to workers from other countries.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 4th day of August in 2025.

A handwritten signature in black ink, reading "Patrick Crowley", with a horizontal line extending to the right from the end of the signature.

Patrick Crowley

Co-Chair, Climate Jobs Rhode Island